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September 20, 1984

BY HAND

Charles C. Bering, Esq.  
U.S. Environmental  
Protection Agency  
Region 1  
J.F.K. Federal Building  
Boston, MA 02203

Dear Mr. Bering:

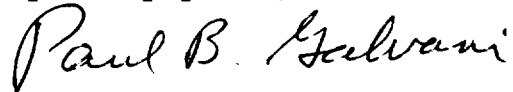
In your letter to me of September 13, you state that the EPA is still considering my request of September 5 for an extension of time until January 26 to respond to the Draft RIFS. You express your personal belief that an extension beyond November 1 will not be granted.

Before the Agency makes up its mind in this regard, I would like to call to your attention the letters I received from Ellen Mahan and Lee Breckenridge, dated September 14 and 13, respectively. In those letters, both attorneys state that the State and Federal Government need additional time, unspecified in duration, to respond to our outstanding discovery request. It is basic that the discovery requested by the defendants, but now delayed by the plaintiff's, be furnished before the defendants must submit their comments on the Draft RIFS.

ROPES & GRAY

I urge you to bring this point to the attention of whoever will be acting upon my request.

Very truly yours,

A handwritten signature in cursive script that reads "Paul B. Galvani".

Paul B. Galvani

PBG/jmm  
Enclosures

cc: Ralph Child  
Daniel Gleason, Esq.  
David McLaughlin, Esq.  
John Quarles, Esq.  
Lee Breckenridge, Esq.  
Jeffrey Bates, Esq.